

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x

IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

Civil Action No.
03 MDL 1570 (RCC)

-----x

This document relates to:

*Thomas E. Burnett, Sr., et al. vs. Al Baraka Investment and Development Corp., et al.,
Case No. 03-CV-5738, 03-CV-9849 (S.D.N.Y.)*

*Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., Case
No. 04-CV-7279 (S.D.N.Y.)*

*World Trade Center Properties, et al. v. Al Baraka Investment and Development Corp, et
al., Case No. 04-CV-7280 (S.D.N.Y.)*

**PLAINTIFFS' MORE DEFINITE STATEMENT AS TO
DEFENDANT MUSTAFA AHMED AL -HISAWI**

Counsel for the above-captioned Plaintiffs hereby provide a more definite statement as to Defendant Mustafa Ahmed Al-Hisawi. This statement, annexed hereto as Exhibit 1, is hereby incorporated into the consolidated Complaints pursuant to the Court's Case Management Order No. 1, dated March 10, 2004, and Case Management Order No. 2, dated June 16, 2004, paragraph 13.

Dated: September 27, 2005

Respectfully submitted,

/S/

Michael E. Elsner, Esq. (NY - ME8337; VA-41424;
SC-72893)

Ronald L. Motley, Esq. (SC-4123)

Jodi Westbrook Flowers, Esq. (SC-66300)

Donald A. Migliori, Esq. (RI-4936; MA-567562;
MN-0245951)

Robert T. Haefele, Esq. (NJ-58293; PA-57937)

Justin B. Kaplan, Esq. (TN-022145)

John Eubanks (MD)

MOTLEY RICE LLC

28 Bridgeside Boulevard

P.O. Box 1792

Mount Pleasant, South Carolina 29465

Telephone: (843) 216-9000

Jayne Conroy, Esq. (NY-JC8611)
Paul J. Hanly, Jr., Esq. (NY-PH5486)
Andrea Bierstein, Esq. (NY-AB4618)
HANLY CONROY BIERSTEIN
& SHERIDAN, LLP
112 Madison Avenue, 7th Floor
New York, NY 10016-7416
Tel: (212) 784-6400

Attorneys for Plaintiffs